

No.

2. I make this declaration to provide the Court with various documents relevant to the Motion, and to inform the Court about efforts Petitioner has made to inform Respondents L1bero Partners, LP (“L1bero Partners”), and Espiritu Santo Technologies, LLC (“ES

Technologies,” and, together with L1bero Partners, “Respondents”), about the filing of this Motion.

3. Attached hereto as **Exhibit 1** is a true and correct copy of ES Holdings’ Request for Arbitration, filed with the International Court of Arbitration of the International Chamber of Commerce on May 1, 2019.

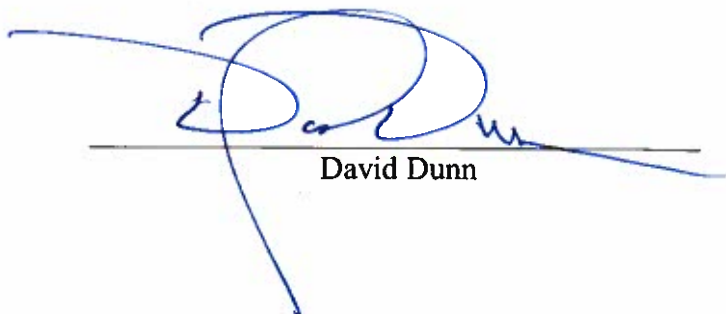
4. Attached hereto as **Exhibit 2** is a true and correct copy of the Petition.

5. On May 1, 2019, attorneys working under my supervision sent emails to several representatives of and attorneys for Respondents whose identity had been made known to them or to the Plaintiff, advising them that the Motion would be filed on May 2, 2019, and attaching a copy of the Petition. A Spanish-language translation of that email was sent to each of these persons. A true and correct copy of the notice email and the Spanish translation thereto is attached as **Exhibit 3**. The email was sent to:

<b>Name/Firm</b>	<b>Role</b>	<b>Email Address</b>
Francisco J. Flores	Listed as recipient of notice to L1bero Partners in the Partners Agreement	<a href="mailto:francisco.flores@romericainvestments.com">francisco.flores@romericainvestments.com</a>
Fabio Covarrubias	President, L1bero Partners; CEO, ES Technologies	<a href="mailto:fcovarrubias@l1bre.com">fcovarrubias@l1bre.com</a>
Jorge Cervantes Trejo, Gonzalez Calvillo, S.C.	Mexican counsel for L1bero Partners	<a href="mailto:jcervantes@gcsc.com.mx">jcervantes@gcsc.com.mx</a>
Jaime Cortés Álvarez, Gonzalez Calvillo, S.C.	Mexican counsel for L1bero Partners	<a href="mailto:jcortes@gcsc.com.mx">jcortes@gcsc.com.mx</a>
Carlos Villasante Santoyo, Villasante y Freyman Abogados	Mexican counsel for L1bero Partners	<a href="mailto:cvillasante@villasante-freyman.com">cvillasante@villasante-freyman.com</a>
Tomas Freyman Valenzuela, Villasante y Freyman Abogados	Mexican counsel for L1bero Partners	<a href="mailto:tfreyman@villasante-freyman.com">tfreyman@villasante-freyman.com</a>
Carlos Malpica Hernández, Malpica, Iturbe, But y Paredes	Mexican counsel for L1bero Partners	<a href="mailto:cmalpica@mibp.com.mx">cmalpica@mibp.com.mx</a>
Horacio Paredes Vázquez, Malpica, Iturbe, But y Paredes	Mexican counsel for L1bero Partners	<a href="mailto:hparedes@mibp.com.mx">hparedes@mibp.com.mx</a>
Rodrigo Núñez Sarrapy, Nuñez Sarrapy Abogados	Mexican counsel for L1bero Partners	<a href="mailto:rnunez@nsa.com.mx">rnunez@nsa.com.mx</a>

6. No previous request for the relief sought in the Motion has been made to this or any other court or tribunal.

Executed by me this 2d day of May, 2019, at New York, New York.



David Dunn